

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of)	
)	
Telephone Number Portability)	CC Docket No. 95-116
)	
North American Numbering Council)	
Recommendation Concerning Local)	DA 98-1112
Number Portability Administration)	NSD File No. L-98-84
Wireline and Wireless Integration)	
)	

REPLY COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation ("MCI"), by its attorneys, submits these reply comments on the Public Notice¹ released by the Common Carrier Bureau (the "Bureau") seeking comment on the North American Numbering Council ("NANC") recommendation concerning integration of wireless and wireline service providers into number portability administration.

INTRODUCTION AND SUMMARY

Rather than focus on the NANC's Wireless-Wireline Integration Task Force Report ("WWITF Report") and advance wireless number portability, some wireless carriers have once again used this proceeding as an opportunity to reiterate their same excuses for delaying number portability. They have once again attempted to use technical challenges as an excuse to delay wireless number portability, and resurrected old arguments including being too busy with other matters and that no wireless carrier wants number portability. As MCI has discussed in its oppositions to the Cellular Telecommunications Industry Association's ("CTIA") prior requests for wireless local number portability ("LNP") delay and forbearance, the reasons articulated in

the opening comments for deferral of wireless LNP still fail to demonstrate the level of extraordinary, unanticipated barrier required by the Commission's rules for such relief.

The Commission should not reward the stonewalling of entrenched wireless carriers in implementing wireless number portability, simply because they have not made implementation a priority. Instead, the Commission should stick to its implementation deadlines for wireless-wireless portability, and in particular should make it clear that no delay in wireless-wireless number portability should occur. Wireless-wireless number portability does not have the same competitive neutrality and technical challenges associated with wireline-wireless number portability, and should promptly be implemented. Implementation of wireless-wireless number portability will significantly advance competition by enabling new entrants to gain market presence and promote wireless resale.

Finally, as MCI advocated in its opening comments, the Commission should initiate a Notice of Inquiry that seeks solutions to the rate center disparity issues, including addressing the use of NXXs for call rating purposes. Only after such an inquiry will the Commission be in the position to address the long term competitive neutrality issues associated with the current disparity in how calls are rated, and the geographic coverage of wireline and wireless serving areas.

¹ *Common Carrier Bureau Seeks Comment on North American Numbering Council Recommendation Concerning Local Number Portability Administration Wireline and Wireless Integration*, Public Notice, CC Docket 95-116, DA 98-1112, NSD File No. L-98-84 (Comm. Carr. Bur. rel. June 29, 1998)("Notice").

DISCUSSION

I. THE COMMISSION SHOULD NOT REWARD ENTRENCHED WIRELESS CARRIER STONEWALLING TACTICS BY DELAYING WIRELESS NUMBER PORTABILITY

Entrenched wireless carriers have used this proceeding as yet another opportunity to provide their well-rehearsed, but out-of-tune plea to delay wireless number portability because of technical challenges. Nearly all the wireless commenters fail to address the merits of the WWITF Report, but instead focus on technical challenges, and the need to delay wireless number portability. Not surprisingly the comments provide little or no new information regarding the technical challenges, and do not justify any sort of delay for wireless number portability implementation. As the wireless carriers point out, there is no doubt that differences between wireless and wireline carriers exist. The fact that wireless carriers are differently situated, however, has already been factored into the Commission's longer LNP implementation schedule for Commercial Mobile Radio Service ("CMRS") providers, and the most recent round of comments offers nothing different from earlier petitions by CTIA for relief from LNP requirements.

The wireless industry has once again pointed to the need to separate the Mobile Identification Number ("MIN") from the Mobile Directory Number ("MDN"), arguing that this separation involves sufficiently complex technical issues that merit delay in implementation of wireless number portability. Providing nationwide roaming while splitting the MIN and MDN unquestionably poses technical challenges, but technical challenges exist for every stage and most aspects of number usage improvement, and certainly of number portability implementation. The Commission cannot extend implementation deadlines each time that the wireless industry

faces technical challenges. Such action would place numbering administration in continual limbo.

In response to the MIN/MDN separation challenge, the Telecommunications Resellers Association ("TRA") has presented an alternative solution based on the local routing number approach used for local wireline number portability.² TRA suggests that instead of requiring simultaneous nationwide wireless number portability ("WNP"), the Commission should mirror its approach in local wireline portability and favor a location routing number approach (using a LRN for call routing and Destination Point Codes for signaling).³ MCI believes that this solution has promise and merits further consideration because, as explained by TRA, it would allow phased-in number portability and would allow portability in the largest markets first, where resellers have the most opportunities to provide competition.⁴

The Commission should be especially weary of extending deadlines for technical challenges of which the industry has had significant advanced notice.⁵ The wireless industry's response is another indication that its priorities have just been elsewhere, and that they simply have not focused on resolving the technical challenges. Time and time again, some wireless carriers have implied that CMRS implementation of WNP is just an interference with higher-placed industry priorities, such as improving their existing market positions through network build-out and expansion. This response by wireless carriers indicates that the urgency for solutions to these technical complexities has not been reflected in the carriers' prioritization of resource allocation. Moreover, in some ways, the industry has even acted on the assumption that

² TRA Comments at 10-13.

³ Id. at 9

⁴ Id. at 12.

⁵ In 1996 the Industry Number Committee documented the MIN/MDN separation challenge in its Report on Number Portability, an issue which the Committee began examining from July 1993. INC Report on Number Portability, INC 96-0607-013, issued July 11, 1996.

the Commission will grant a delay. For example, the wireless industry has done little or no work on the development and testing of operational support systems. This failure suggests the Commission cannot leave wireless carriers to self pace, and demonstrates the need for the Commission to more closely monitor wireless carrier progress. In view of the decisions by some wireless providers to focus their resources on other business agendas, the Commission should not accept last-minute cries of strained resources as justification for delaying a crucial step that would increase competition in both wireless and wireline markets.

Moreover, delay in WNP implementation is not justified by pointing to simultaneously occurring deadlines for industry mandates. CTIA argues that the industry is overburdened by costly, simultaneous industry responsibilities, such as Y2K and CALEA, which draw from the same pool of technical personnel, and has argued that number portability, as the most expensive of these responsibilities, should be shelved.⁶ Again, this reflects the industry perspective that WNP implementation is the lesser of its priorities. Aside from the fact that wireless carriers have sought to delay the implementation of other mandates, wireless carriers are not the only ones faced with simultaneous and costly industry responsibilities. For example, wireline carriers, and in particular competitive LECs, who continue to deploy local number portability must also address Y2K and CALEA, while simultaneously building their own networks.

The Commission has significant and pressing competitive policy rationales for implementing WNP that remain unchanged, and the Commission's insistence that the industry meet the June 1999 deadline is by no means an arbitrary date tacked at the end of the deadlines for wireline portability implementation deadline as Bell Atlantic suggests.⁷ Rather, the need for resellers and other new entrants to further wireless competition, as well as the ensuing benefits to

⁶ CTIA Comments at 7.

⁷ Bell Atlantic Comments at 8.

consumers, continues to provide the Commission with an enormous responsibility and justification to maintain WNP deadlines. Moreover, in setting the June 1999 deadline, the Commission took into account the technical challenges peculiar to the wireless industry, and in view of those problems determined, based on the record, that the wireless industry was capable of meeting the June 1999 deadline.⁸ The wireless industry would have the Commission cast-aside the 1999 deadline in exchange for vague timeframes of 18 to 24 months.⁹ One carrier, Sprint PCS, suggested that the commission throw out WNP deadlines altogether and “let the wireless carriers implement number portability in a flexible fashion, in the manner and speed dictated by the market.”¹⁰ As the Commission has already determined, real deadlines, and not amorphous timeframes, are consistent with the effective implementation of wireless number portability.¹¹

Also, contrary to the claims of Bell Atlantic and Sprint PCS, new market participants do need and still are looking to WNP as a means of leveling the playing field in the wireless market.¹² Bell Atlantic has argued that new entrants now oppose the Commission’s implementation of WNP, and since WNP was intended to benefit new entrants, the Commission no longer has a rationale for its implementation and thus should eliminate the WNP deadline.¹³ However, Bell Atlantic cannot just point to a handful of comments as an indication that new

⁸ *Telephone Number Portability*, First Memorandum Opinion and Order, CC Docket 95-116, RM-8535 (rel. Mar. 11, 1997). (“First Memorandum Opinion and Order”). “We recognize that the wireless industry has lagged behind the wireline industry in developing a method for providing number portability and that the wireless industry faces special technical challenges in doing so. Nonetheless, we find that the schedule for implementation of number portability by cellular, broadband PCS, and covered SMR providers is reasonable and takes into account the current stage of development for wireless number portability.” *Id.* at 134

⁹ CTIA Comments at 5-6.

¹⁰ Sprint PCS Comments at 9.

¹¹ “In light of the[] positive competitive results that are likely to be produced, we continue to believe that number portability should be provided by wireless carriers with as little delay as possible. Setting specific deadlines, rather than amorphous ‘target dates,’ is consistent with this goal.” First Memorandum Opinion and Order at ¶ 135.

¹² Bell Atlantic Comments at 11-12. Sprint PCS Comments at 4.

¹³ Bell Atlantic Comments at 12.

entrants as a whole view WNP as an impediment rather than an aid to their ability to compete.¹⁴ In fact, there are new entrants who have opposed eliminating the deadline for the very reason that the deadline is needed to insure that new entrants can gain a foothold in the industry. For example, TRA which represents many new entrants that have the significant potential to challenge the position of existing wireless carriers states that "number portability is essential to the fulfillment of the resellers' competitive role in the wireless markets."¹⁵ Moreover, TRA indicates that delays in WNP implementation could "virtually eliminate any competitive threat that might be posed by resellers."¹⁶ This is particularly true given that the Commission has already announced the commencement of the five-year period during which CMRS carriers must offer unrestricted resale of their services under 47 C F R. 20.12(a) and (b), and thus the unfettered resale period will sunset soon after the timeframe when the entrenched carriers have vaguely indicated they will be able to implement WNP.¹⁷ Because the clock is already ticking for resellers, it is imperative that wireless-wireless portability commence as soon as possible.

II. TECHNICAL CHALLENGES AND COMPETITIVE NEUTRALITY ISSUES RELATED TO IMPLEMENTATION OF WIRELESS-WIRELINE PORTABILITY DO NOT JUSTIFY DELAYING WIRELESS-WIRELESS PORTABILITY

The wireless industry comments provide absolutely no justification whatsoever for delaying wireless-to-wireless number portability. In its opening comments, MCI encouraged the Commission to require timely deployment of LNP for wireless-wireless porting (including porting to wireless resellers), whether or not all technical details associated with wireless-

¹⁴ Bell Atlantic Comments at 12 ns. 10 and 12.

¹⁵ TRA Comments at 6 (emphasis added).

¹⁶ TRA Comments at 6.

¹⁷ *Commencement of Five-Year Period Preceding Termination of Resale Rule Applicable to Certain Covered Commercial Mobile Radio Service Providers*, Public Notice, CC Docket 94-95, DA 1337 (Comm. Carr. Bur. rel. July 2, 1998).

wireline integration have been resolved.¹⁸ The comments further illustrate the wisdom of this proposal in that wireless-wireless portability may be implemented more simply, does not present competitive neutrality issues and advances wireless competition, particularly with respect to enabling new entrants to gain a market foothold and promoting resale.

There is no question that the technical difficulties with wireline-wireless portability today preclude competitive parity in number portability between wireless and wireline carriers. Both the rate center paradigm and differences in porting intervals for wireline and wireless carriers are significant challenges to the effective and speedy implementation of wireline-wireless portability. The most significant unresolved issue in wireless-wireline integration arises from differences in service areas and billing methods, which make unrestricted porting of numbers from wireline to wireless providers far easier than the converse. The root cause of this disparity is the traditional “rate center” paradigm for wireline network call rating, under which each wireline carrier must use one NXX code (10,000 numbers) for each switch in each rate center, due to incumbent local exchange carrier (“LEC”) historic use of NXXs for both routing *and* call rating purposes. If left unresolved, this association of NXXs with call rating, and thus the rate center “disparity” issue, threatens to substantially accelerate exhaust of the entire North American Numbering Plan (“NANP”), with drastic consequences for the industry, consumers and the American (and global) economy.

The rate center disparity allows for the unrestricted porting of numbers from wireline to wireless carriers, but not the converse; because it is not competitively neutral, this problem therefore means that implementing wireless-wireline LNP before reasonable parity is available

¹⁸ MCI Comments at ii.

violates the Commission's numbering rules.¹⁹ AT&T, however, argues that because incumbent LECs chose the rate center structure, wireline carriers cannot now argue that the structure is discriminatory.²⁰ But on the contrary, competitive LECs and other wireline new entrants have been required to adopt the rate center paradigm not because it is technically necessary, but rather only because incumbent LECs lack the capability to rate and bill local calls in any other manner. Thus, it is wrong as both a factual and policy matter to suggest that all wireline carriers should be disadvantaged because of the historic incumbent LEC utilization of NXXs for both routing and rating purposes.

Also unpersuasive is AT&T's argument that rate center disparity is not a competitive disadvantage to wireline carriers because end users "have always been aware" that wireless service allows a broader area for local calls.²¹ That may well be true, but customers' knowledge of the differences does not negate the competitive disparity. The fact is that, under current call rating approaches, wireless carriers will be able to port numbers from wireline carriers in a scope that is hugely disproportionate to the ability of wireline carriers to port numbers from wireless carriers. Consequently, in an era where wireless services are increasingly becoming a substitute for wireline local exchange service, LNP will be a "one-way street." Without reasonable parity in wireline-wireless portability, LNP will impede competition by creating an artificially unbalanced playing field at a crucial time in the development of local service alternatives.

¹⁹ 47 C.F.R. §§ 52.9(a)(2), (a)(3). In its opening comments, MCI argued that the Commission should reject the recommendations of the WWITF report for wireless LNP integration solutions that unduly favor wireless carriers and fail the competitively neutrality requirement of the numbering rules: (1) differentials in porting intervals; (2) new NPAC systems and configurations designed to meet special wireless carrier needs; and (3) replacing the LSR process with a modification to the NPAC SMS at no cost to wireless carriers. MCI Comments at 9-10.

²⁰ AT&T Comments at 4.

²¹ AT&T Comments at 5.

In order to ensure that the problems associated with wireline-wireless portability do not unnecessarily delay wireless-wireless portability, MCI has proposed that the Commission address wireline-wireless LNP issues, including alternatives to traditional wireline rate centers, in a separate Notice of Inquiry proceeding.²² Instead of delaying wireless number portability as a result of the rate center differences between wireless and wireline networks, the Commission instead should require prompt implementation of wireless-wireless portability while it tackles the problem of rate center disparity and, in the longer term, disassociation of Central Office (“CO”) code assignment from call rating. This effort is plainly necessary to optimize number usage and maintain competitive neutrality in an era of rapidly exhausting numbering resources.

Simply put, if the Commission exempts wireless carriers from all LNP obligations, including wireless-wireless number portability, it will never be possible for a wireless subscriber to change carriers without changing telephone numbers. While that business model may meet the business interests of some wireless carriers, it fails the ultimate public interest test for competitive neutrality in numbering. No less than any other end user, wireless subscribers should have the service, price and quality alternatives that become available where the seamless change of providers allows customers to “vote with their feet” instead of being locked in to existing carriers because of unequal access to numbers.

²² MCI Comments at 3 and 14.

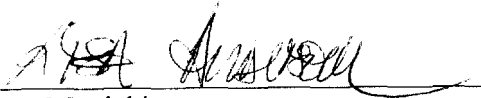
CONCLUSION

It is crucial that the Commission not allow wireless carriers to make wireless LNP even less of a priority than the wireless industry has already done. The technical complexities associated with wireline-wireless LNP should not obscure the fact that wireless-wireless portability can and must be implemented promptly. Over the longer term, the Commission should take a leadership role in examining solutions to the issue of rate center "disparity" between wireless and wireline networks, and should begin the process of disassociating rating from CO code assignment, by initiating an NOI proceeding to explore available options for fashioning reciprocal wireline-wireless LNP.

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